

**DECLARATION OF
SIMON STEWART DAVIDSON**

EXHIBIT D

BETWEEN:

SEA CONSORTIUM PTE LTD

Claimant

- and -

HRC SHIPPING LIMITED

Respondent

**The Claimant's Schedule of Legal Cost and Expense
Incurred in Enforcement of the Arbitration Awards against the Respondent
Excluding the Costs Incurred in Obtaining the Awards and on Appeal**

This schedule covers the legal costs and disbursements incurred by the claimant in seeking to enforce the three arbitration awards rendered to date against the respondent, in Singapore, France and elsewhere where the respondent appeared to have assets or where enforcement steps were considered feasible.

Costs and disbursements incurred in obtaining the awards, defeating the appeal against the first award and costs awarded to the claimant by the tribunal's first, second and third partial awards of 26th March, 24th May and 16th November 2007 have been excluded.

The costs and disbursements incurred and claimed by this Schedule "A" were those of the claimant's English solicitors Holman Fenwick & Willan in their offices in Singapore and Paris.

The costs were billed in Singapore dollars and the total claimed is expressed in United States dollars at the latest exchange rate published by the Monetary Authority of Singapore: US\$ 1 = S\$ 1.4231

The rates at which the fee-earners involved charged for their time were agreed with the claimant and are stated in the invoice narratives as follows:

<u>Name</u>	<u>Status</u>	<u>Rate</u>
S.S. Davidson (SSD)	Partner, Singapore	S\$ 775 / hr
D.M. Janssen (DMJ)	Assistant Solicitor, Singapore	S\$ 600 / hr
M. M. Buisset (MMB)	Assistant Solicitor, Singapore	S\$ 450 / hr
J. Teoh (JTS)	Assistant Solicitor, Singapore	S\$ 400 / hr
T. Clemens-Jones (TCJ)	Partner, Paris	€ 450 / hr
S. Schweitzer (SSW)	Assistant Solicitor, Paris	€ 330 / hr

April 2007 Bill No. S07524:

Singapore fees for 30 March – 26 April 2007	S\$	40,597.50	
Less fees incurred on obtaining awards and on appeal			
Partner (SSD) 6 hrs 48 mins	S\$	-5,270.00	
Assistant Solicitor (DMJ) 8 hrs 42 mins	S\$	-5,220.00	
Less fees incurred on Bangladeshi admiralty action			
Partner (SSD) 0 hrs 18 mins	S\$	-232.50	
Assistant Solicitor (DMJ) 2 hrs 12 mins	S\$	-1,320.00	
Plus disbursements incurred on enforcement	S\$	2,121.95	
	S\$	30,676.95	US\$ 21,556.43

May 2007 Bill No. S08039:

Singapore fees for 27 April – 28 May 2007	S\$	49,117.50	
Less fees incurred on obtaining awards and on appeal			
Partner (SSD) 2 hrs 18 mins	S\$	-1,782.50	
Assistant Solicitor (DMJ) 11 hrs 0 mins	S\$	-6,600.00	
Less fees incurred on Bangladeshi admiralty action			
Partner (SSD) 0 hrs 24 mins	S\$	-310.00	
Assistant Solicitor (DMJ) 5 hrs 0 mins	S\$	-3,000.00	
Plus disbursements incurred on enforcement	S\$	567.61	
	S\$	37,992.61	US\$ 26,697.08

June 2007 Bill No. S08067:

Singapore fees for 29 May – 27 June 2007	S\$	44,922.50	
Less fees incurred on obtaining awards and on appeal			
Partner (SSD) 5 hrs 42 mins	S\$	-4,417.50	
Assistant Solicitor (DMJ) 8 hrs 42 mins	S\$	-5,220.00	
Plus disbursements incurred on enforcement	S\$	397.55	
	S\$	35,682.55	US\$ 25,073.82

July 2007 Bill No. S08067:

Singapore fees for 28 June – 30 July 2007	S\$	56,332.50	
Less fees incurred on obtaining awards and on appeal			
Partner (SSD) 0 hrs 12 mins	S\$	-155.00	
Assistant Solicitor (DMJ) 5 hrs 48 mins	S\$	-3,480.00	
Less fees incurred on Bangladeshi admiralty action			
Partner (SSD) 1 hrs 36 mins	S\$	-1,240.00	
Assistant Solicitor (DMJ) 28 hrs 42 mins	S\$	-17,220.00	
Paris bill no. 2007 1 0797 for 16 March – 28 June 2007	S\$	18,762.23	
	S\$	52,999.73	US\$ 37,242.45

August 2007 Bill No. S08150:

Singapore fees for 31 July – 30 August 2007	S\$	72,297.50	
Less fees incurred on obtaining awards			
Partner (SSD) 0 hrs 54 mins	S\$	-697.50	
Assistant Solicitor (DMJ) 15 hrs 30 mins	S\$	-9,300.00	
Assistant Solicitor (MMB) 5 hrs 0 mins	S\$	-2,250.00	
Less fees incurred on Bangladeshi admiralty action			
Partner (SSD) 6 hrs 18 mins	S\$	-4,882.50	
Assistant Solicitor (DMJ) 38 hrs 42 mins	S\$	-23,220.00	
Assistant Solicitor (MMB) 2 hrs 36 mins	S\$	-1,170.00	
	S\$	30,777.50	US\$ 21,627.08

September 2007 Bill No. S08220:

Singapore fees for 31 August – 26 September 2007	S\$	43,900.00	
Less fees incurred on obtaining awards			
Partner (SSD) 0 hrs 30 mins	S\$	-387.50	
Assistant Solicitor (DMJ) 13 hrs 0 mins	S\$	-7,800.00	
Less fees incurred on Bangladeshi admiralty action			
Partner (SSD) 0 hrs 12 mins	S\$	-155.00	
Assistant Solicitor (DMJ) 1 hrs 54 mins	S\$	-1,140.00	
	<u>S\$</u>	<u>34,417.50</u>	US\$ 24,184.88

October 2007 Bill No. S08296:

Singapore fees for 27 September – 30 October 2007	S\$	36,195.00	
Less fees incurred on obtaining awards			
Partner (SSD) 0 hrs 36 mins	S\$	-465.00	
Assistant Solicitor (DMJ) 0 hrs 54 mins	S\$	-540.00	
Less fees incurred on Bangladeshi admiralty action			
Partner (SSD) 0 hrs 6 mins	S\$	-77.50	
Assistant Solicitor (DMJ) 3 hrs 30 mins	S\$	-2,100.00	
	<u>S\$</u>	<u>33,012.50</u>	US\$ 23,197.60

November 2007 Bill No. S08329:

Singapore fees for 31 October – 27 November 2007	S\$	25,695.00	
Less fees incurred on obtaining awards (and on appeal)			
Partner (SSD) 0 hrs 36 mins	S\$	-465.00	
Assistant Solicitor (DMJ) 1 hrs 30 mins	S\$	-900.00	
Less fees incurred on Bangladeshi admiralty action			
Partner (SSD) 0 hrs 42 mins	S\$	-542.50	
Assistant Solicitor (DMJ) 2 hrs 12 mins	S\$	-1,320.00	
	<u>S\$</u>	<u>22,467.50</u>	US\$ 15,787.72

December 2007 Bill No. S08405:

Singapore fees for 28 November – 21 December 2007	S\$	13,852.50	
Less fees incurred on Bangladeshi admiralty action			
Partner (SSD) 0 hrs 24 mins	S\$	-310.00	
Assistant Solicitor (DMJ) 1 hrs 30 mins	S\$	-900.00	
Plus disbursements incurred on enforcement	<u>S\$</u>	<u>133.00</u>	
	<u>S\$</u>	<u>12,775.50</u>	US\$ 8,977.23

January 2008 Bill No. S084446:

Singapore fees for 22 December 2007 – 16 January 2008	S\$	17,332.50	
Less fees incurred on obtaining awards (and on appeal)			
Assistant Solicitor (DMJ) 0 hrs 18 mins	S\$	-180.00	
Less fees incurred on Bangladeshi admiralty action			
Assistant Solicitor (DMJ) 0 hrs 12 mins	S\$	-120.00	
Plus disbursements incurred on enforcement	S\$	77.74	
Paris bill no. 2007 1 1449 for 10 July – 28 November 2007	<u>S\$</u>	<u>3,653.55</u>	
	<u>S\$</u>	<u>20,763.79</u>	US\$ 14,590.53

TOTAL	<u>S\$</u>	<u>311,566.13</u>	<u>US\$ 218,934.81</u>
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Sea Consortium Pte Ltd
11 Duxton Hill
Singapore 089595

3 Church Street
#19-03
Singapore 049483

Tel +65 6534 0195
Fax +65 6534 5864

holmans@hfw.com.sg
www.hfw.com

Attention: Messrs Tim Hartnoll/Tristan Howitt

TAX INVOICE
GST REG NO: M9-0005261-C

Date: 27 April 2007

Our Ref: SSD/10656/22/iy

Bill No.: S07524

JAAMI

Period Covered : 30 March to 26 April 2007

To our professional charges for all advice and assistance rendered in respect of the above matter as per particulars set out in the schedule attached.

Our fees:	S\$ 40,597.50
+5% GST	S\$ 2,029.88

Disbursements:

Sotoners' Bill VY/DN/0704037, attached	S\$ 1,214.40
Wong, Chang & Tay Partnership, invoice B/10140/2007	S\$ 578.00
Courier, telephone and photocopying charges, and other incidentals	S\$ 329.55
+5% GST	S\$ 106.09

Total	<u>S\$44,855.42</u>
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HOLMAN FENWICK & WILLAN
HFWSPV76304-1

Direct remittance may be made to The Hong Kong and Shanghai Banking Co. Ltd.
Collyer Quay Branch, 21 Collyer Quay, Singapore 049320, quoting our bill no.
GB Pounds A/C 260-258843-181 Swift Code: HSBCSGSG
Singapore Dollars A/C 141-364083-002 Swift Code: HSBCSGSG
US Dollars A/C 260-258843-180 Swift Code: HSBCSGSG
If paying by cheque, please return the attached copy with your payment.
Please pay net of all bank charges.

Breakdown of Time on a Daily Basis

HFW Bill No S07524

Club Ref: NA
 Our File No: 00010656 / 00000022
 Client: Sea Consortium Pte Ltd
 Matter: SX Jaami / X-Press Resolve / X-Press Manaslu

<u>Transaction Date</u>	<u>FE Name</u>		<u>Hours</u>
30/03/2007	D Janssen	Emails from Freehills and Rajah & Tann, email response to Rajah & Tann, emails to SeaCon and Club re attachments and shipwatch, email from Yong Lim Kong on One Herd's bankers, further email correspondence with Sea Consortium and Rajah & Tann re attachment and enforcement, commencing preparation of costs schedule, email correspondence with Rajah & Tann re documents for enforcement proceedings, reviewing draft summons, email correspondence with HFW London re Rajah & Tann's queries on service and collection of the award, email information to Rajah & Tann;	3.6
30/03/2007	S S Davidson	Calls to DMJ and Tim Hartnoll.	0.3
31/03/2007	D Janssen	Perusing emails from Stephanie Schweitzer on translation of award and service of arrest, email response;	0.3
02/04/2007	D Janssen	Discussing matter and and considering tasks with Simon Davidson; email to Stephanie Schweitzer forwarding claim form to confirm address for service of arrest papers, receiving original award by courier, email acknowledgment to HFW London and query re certification to Rajah & Tann, researching and obtaining LMAA interest rates, considering email response from Toh Kian Sing of Rajah & Tann, email from Yong Lim Kong on HRC bankers in Malaysia and progress in US, email response to Yong and query to Freehills, email from SeaCon on HRC vessel position re calls at Singapore, email from Kendall Tan of Rajah & Tann with draft affidavit in support of application for enforcement of award;	2.5
02/04/2007	S S Davidson	Reviewing reasons for arbitration award. Discussion with DMJ.	0.5
03/04/2007	D Janssen	Email advice from Freehills and response, email report and advice to Sea Consortium and Club on Rule B attachments and enforcement procedure in New York, discussing and considering issues with Simon Davidson, further email correspondence with Yong Lim Kong clarifying points raised on Rule B attachments and enforcement of award into attached funds, email correspondence with Yong Lim Kong and Jeffrey Lim regarding HRC's fleet and Bangladeshi registry searches, reviewing and amending draft affidavit in support of enforcement application in Singapore, email revised draft with further documents to exhibit to Rajah & Tann, discussing and considering post-award statutory interest with Simon Davidson and in telcon with Kendall Tan of Rajah & Tann;	3.3
03/04/2007	S S Davidson	Reviewing correspondence and discussing enforcement options with DMJ.	0.4

04/04/2007	D Janssen	Email from Rajah & Tann and response, briefing by Simon Davidson on discussions with Kendall Tan, liaising with Kendall Tan, reviewing and amending summons and affidavit in response, considering amendments with Simon Davidson, meeting with Kendall Tan and notary for certification of documents and execution of affidavit, email from Rajah & Tann with court documents as filed, email report to SeaCon and Club forwarding court papers, further email correspondence with SeaCon;	3.2
04/04/2007	S S Davidson	Reviewing the affidavit to enforce the award in Singapore. Discussion with DMJ.	0.4
05/04/2007	D Janssen	Email correspondence with SeaCon re forwarded scanned court documents and information on HRC's ships; email correspondence with Rajah & Tann re enforcement proceedings, HRC's fleet and bank accounts and advice on enforcement in Malaysia; email from HFW Paris on service of conservatory arrest and response, email report to SeaCon and Club and reply; briefing Simon Davidson on enforcement proceedings and enquiries;	1.0
06/04/2007	D Janssen	Email from SeaCon Lanka on vessel positions, email from HFW Paris on funds attached at CMA CGM and response, email report to SeaCon and Club, further email advice from HFW Paris and initial instructions by email reply;	0.5
07/04/2007	D Janssen	Email letter from Hossain giving notice of challenging award and seeking stay of execution, briefing Simon Davidson;	0.4
08/04/2007	D Janssen	C/M email from Dr Zahir;	0.1
09/04/2007	D Janssen	Reviewing and amending Dr Zahir's draft written objections to amendment of plaint, considering fax advice on Malaysian law from Lee Ong & Kandiah, discussing and considering response to Hossain with Simon Davidson, reviewing provisions of Arbitration Act on appeal and stay of execution against security for claim, email advice and recommendations to SeaCon and Club on proceedings in France and Bangladesh and on advice on steps to take in England and Malaysia, further email correspondence with Yong Lim Kong to clarify and expand advices and obtain instructions, email instructions to HFW Paris and Dr Zahir, email response to Hossain, reviewing and amending notarial certificates for arbitration agreement and award, email amendments to notary public Mr Chang, email from SeaCon Singapore on vessel positions, fax from Rajah & Tann with originating summons and correspondence with court;	5.0
09/04/2007	S S Davidson	Reviewing emails and call to DMJ.	0.4

10/04/2007	D Janssen	Further fax advice from Lee Ong & Kandiah on Malaysian enforcement procedure, discussing and considering appeal of award and steps to take in England with Simon Davidson, email report to SeaCon and Club, email enquiries to Julius & Creasy in Sri Lanka and Sotoners in Taiwan, email response from Sotoners, liaising with notary public over certification of arbitration agreement and award, obtaining certified copies, email from HFW Paris re timing for re-serving attachment order, enquiry to SeaCon and response, researching case law on stay of execution of arbitration award, briefing Simon Davidson, email from SeaCon on vessel positions, discussing and considering application for further partial award on costs of arbitration and interest with Simon Davidson, reviewing and amending draft application to arbitrator and email to SeaCon and Club;	4.5
10/04/2007	S S Davidson	Reviewing emails. Discussion with DMJ. Email to HFW London. Drafting application for further award on costs and interest. Research on stay of execution.	1.6
11/04/2007	D Janssen	Emails from SeaCon, email instructions to HFW Paris, liaising with SeaCon re execution of court papers in Bangladesh, email enquiry to Sotoners seeking advice on Taiwanese law for attachment and enforcement, liaising with Rajah & Tann re Singapore court order for enforcement and serving it in Bangladesh, considering email response from Sotoners and further queries in reply, considering initial email advice from Julius & Creasy on enforcement in Sri Lanka and briefing Simon Davidson;	3.5
12/04/2007	S S Davidson	Discuss with DMJ. Email from Rajah & Tann and reply.	0.4
12/04/2007	D Janssen	Considering further email advice from Sotoners on law and practice in Taiwan, liaising with Rajah & Tann re service in Bangladesh, emails from SeaCon on HRC's fleet and attaching vessels and bank accounts in Malaysia and Sri Lanka;	2.5
13/04/2007	S S Davidson	Reviewing correspondence on enforcement in Malaysia. Call to Rajah & Tann. Email from arbitrator and report to clients.	0.3
13/04/2007	D Janssen	Considering email reply from Sotoners, email report to SeaCon with report on advices obtained from Taiwanese and Sri Lankan lawyers, email from Dr Zahir reporting on status of Bangladesh action; email instructions to Julius & Creasy to advise further, considering email directions from Mark Hamsher;	2.0
16/04/2007	S S Davidson	Two emails from Hossain and email from Rajah & Tann. Report to clients. Reviewing arbitration award for purposes of appeal. Drafting instructions to counsel to draft an appeal notice. Email and call to Rajah & Tann regarding enforcement in Malaysia.	1.3
17/04/2007	S S Davidson	Emails from Freehills in New York about attachment. Call to Tim Hartnoll. email to clients. Emails from Sri Lankan lawyers and regarding enforcement in Malaysia. Discussion with DMJ. Call to counsel upon appeal from arbitration award.	1.4

17/04/2007	D Janssen	Emails from Rajah & Tann and Hossain, reviewing instructions to counsel and report to clients, considering email instructions from Yong Lim Kong and further email advice from Julius & Creasy; emails from Hossain seeking time extension and from Freehills reporting on funds transfers attached in New York, reviewing report to SeaCon and RaetsAsia, discussing and considering enforcement strategy with Simon Davidson, taking instructions from SeaCon re New York, email and courier letter with instructions to Orr Dignam to serve Singapore court order on HRC in Bangladesh, email further queries on Sri Lankan procedure to Julius & Creasy, email enquiry to 20 Essex Street, telephone conference with counsel David Lewis together with Simon Davidson, email enquiry to HFW Paris re progress, email exchanges and telcon with Julius Creasy re Sri Lankan advices, email correspondence with HFW Paris re further steps to attach and enforce in France, considering email advice from David Lewis, email instructions to Freehills in New York;	4.3
18/04/2007	S S Davidson	Email from and call to Freehill Hogan. Report to clients.	0.4
19/04/2007	D Janssen	Emails from SeaCon, HFW Paris, Freehills, Julius & Creasy and Orr Dignam; email response to HFW Paris; discussing and considering position with Simon Davidson, reviewing correspondence and advices, preparing overview of proceedings and steps underway in various jurisdictions, reviewing and amending note with Simon Davidson; meeting with Tim Hartnoll, Tristan Howitt and Yong Lim Kong at SeaCon's offices; email reply to Orr Dignam and email report to Rajah & Tann re service of Singapore court order in Bangladesh, email instructions to put proceedings on hold in Taiwan and Sri Lanka to Sotoners and Julius & Creasy, email response from Julius & Creasy;	3.5
19/04/2007	S S Davidson	Email from Freehill Hogan and discussion with DMJ. Meeting with clients. Call to Rajah & Tann.	1.2
20/04/2007	D Janssen	Considering fax advice from Lee Ong & Kandiah on enforcement in Malaysia, discussing issues with Simon Davidson, email report and request for business information to SeaCon, receiving original service confirmation by courier from Orr Dignam, email correspondence with Jainil Bhandari and Kendall Tan of Rajah & Tann re steps to be taken in Malaysia and Singapore; arranging for certification of award by notary public for French proceedings, email correspondence with and courier letter with certified true copy to HFW Paris, email instructions to HFW London re appeal by HRC and response;	2.5
21/04/2007	D Janssen	Email enquiry to Freehills;	0.2
23/04/2007	S S Davidson	Email from Orr, Dignam and report to clients. Also report on Tradewinds article. Email from Rajah & Tann.	0.4
23/04/2007	D Janssen	Email from Orr Dignam, briefing Simon Davidson in telcon, email from Rajah & Tann, liaising with Simon Davidson by email;	0.4
24/04/2007	S S Davidson	Fax from Watson, Farley & Williams regarding appeal from arbitration award. Advising on nature of the appeal. Two emails from Dr Zahir. Email to counsel to draft cross appeal.	1.0

24/04/2007	D Janssen	Email advice from Freehills and response, considering emails from Rajah & Tann and Dr Zahir re proceedings in Singapore and Bangladesh, perusing emails from HFW London and faxes from Watson Farley & Williams re HRC's challenge of award before court in London, discussing and considering issues with Simon Davidson and reviewing report to SeaCon and RaetsAsia, email instructions from Yong Lim Kong on London proceedings, email from SeaCon on vessel positions, email report and recommendations to SeaCon on Bangladesh proceedings, email response with comments and queries on draft papers for Singapore proceedings to Rajah & Tann, telcon with Kendall Tan of Rajah & Tann re affidavit of service and registered address for statutory demand, telcon with Toh Kian Sing of Rajah & Tann re anticipated application for suspension of enforcement in Singapore pending an application to set aside the award in London, briefing Simon Davidson; email enquiry to Orr Dignam re service requirements;	4.5
25/04/2007	D Janssen	Discussing and considering issues on appeal in telcon with SSD, perusing email	0.2
25/04/2007	S S Davidson	Reviewing the notice of appeal, legislation and heads of claim. Report to client and note to counsel.	2.5
26/04/2007	D Janssen	Reviewing email reports and advice, discussing and considering matters on appeal with SSD, email instructions to Rajah & Tann and Dr Zahir, email correspondence with Jeffrey Lim. Telcon with and email from Kendall Tan of Rajah & Tann re affidavit of service. Email correspondence with HFW Paris re enforcement of award there against funds attached at CMA CGM.	3.0
26/04/2007	S S Davidson	Email from A Hossain and reply. Discussing appeal with DMJ.	0.4

Total: 63.9

SUMMARY				
		Hours Charged	Hourly Rate	Total
Partner	Simon Davidson	12.9	S\$775	US\$ 9,997.50
Assistant Solicitor	Dirk Janssen	51.0	S\$600	US\$30,600.00
Total :				US\$40,597.50

寬達法律事務所

TEL: 886-2-23811997

SOTONERS

FAX: 886-2-23703546

ATTORNEYS AT LAW

E-MAIL bfg1626@ms14.hinet.net

台北市中正區 100 廣州街 8 巷 21 號 21, LANE 8, KWANG-CHOW ST, CHUNG-CHEN DISTRICT, TAIPEI, TAIWAN.

Your ref: to be advised

Date: 26 April 2007

Our ref.: VY/217027

Total: 1 Page

Debit Note No.: VY/DN/ 0704037

To: Holman Fenwick & Willan
3 Church Street #19-03
Singapore 049483

INVOICE

Re: JAAMI – Enforcement of Arbitration Award

To : Professional services rendered

USD800.-

Including receiving instructions, reviewing
arbitration documents, rendering legal advice, etc.

USD 800.-

※Please make remittance by TELEGRAPHIC TRANSFER to

HUA NAN COMMERCIAL BANK LTD.

CHUNG HWA ROAD SUB-BRANCH

SWIFT CODE : HNBK TWTP

No.59 Sec.2, Chung Hwa Road,

Taipei, Taiwan, R.O.C.

Account Name : Sotoners Attorneys at Law

Account No. : 102-97-006196-6

14 Robinson Road #12-01
Far East Finance Building
Singapore 048545

Telephone: 6222-3390, Fax: 6226-7069, E-mail: changlaw@pacific.net.sg

INVOICE

To: **M/S HOLMAN FENWICK & WILLAN**
3 Church Street #19-03
Singapore 049483

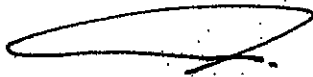
Our Reference: CSH 37 NP 07 HFW

Bill No : B/10140/2007

Date: 10/4/2007

Particulars	Disbursements	Charges
<u>COMMISSIONER FOR OATHS</u>		
TO OUR PROFESSIONAL CHARGES		
Oath fees - 4 April 2007		
(1) Affidavit of Dirk Janssen (2x)		\$30.00
(2) Certified true copies of 1 annexure to the Originating Summons (Partial Arbitration Award) - 50 pages @ \$2.00		\$100.00
(3) Certified true copies of 2 exhibits in the Affidavit :- Exhibit 1 - Memorandum of Agreement (24 pages) @ \$2.00 Exhibit 2 - Partial Arbitration Award (50 pages) @ \$2.00		\$48.00 \$100.00
(4) Preparing 4 sets of Notarial Certificates for 2 sets of Memorandum of Agreement and 2 sets of Partial Arbitration Award @ \$75.00		\$300.00
Ref : 10656/22		
Total Payable		\$578.00

PLEASE PAY SINGAPORE DOLLARS FIVE HUNDRED AND SEVENTY EIGHT ONLY



M/S WONG CHANG & TAY PARTNERSHIP

Please issue cheque in favour of "WONG CHANG & TAY PARTNERSHIP". Payment is due within fourteen (14) days from the date hereof. Please quote our bill and reference numbers when making payment.

E&O.E.

Case 1:07-cv-09443-PAC
Sea Consortium Pte Ltd
11 Duxton Hill
Singapore 089595

Document 9-5

Filed 04/04/2008

3 Church Street
#19-03 Page 13 of 25

Singapore 049483

Tel +65 6534 0195

Fax +65 6534 5864

Attention: Messrs Tim Hartnoll/Tristan Howitt

holmans@hfw.com.sg

www.hfw.com

TAX INVOICE

GST REG NO: M9-000526 I-C

Date: 30 May 2007

Our Ref: SSD/10656/22/iy

Bill No.: S08039

JAAMI

Period Covered : 27 April to 28 May 2007

To our professional charges for all advice and assistance given in this matter as set out in the attached breakdown of time spent.

Our fees:	S\$ 49,117.50
+5% GST	S\$ 2,455.88

Disbursements:

Professional fees of Mr David Lewis as per bill attached	S\$ 5,325.25
Holman Fenwick & Willan's bills 0080097A and 0080097B, attached	S\$ 27,484.95
Notarisation of Arbitration Award	S\$ 285.00
Courier, fax and photocopying charges, and other incidentals	S\$ 282.61
+5% GST	S\$ 1,668.89

Total	<u>S\$ 86,620.08</u>
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HOLMAN FENWICK & WILLAN

HFWSP\82505-1

Direct remittance may be made to The Hong Kong and Shanghai Banking Co. Ltd.
Collyer Quay Branch, 21 Collyer Quay, Singapore 049320, quoting our bill no.
GB Pounds A/C 260-258843-181 Swift Code: HSBCSGSG
Singapore Dollars A/C 141-364083-002 Swift Code: HSBCSGSG
US Dollars A/C 260-258843-180 Swift Code: HSBCSGSG
If paying by cheque, please return the attached copy with your payment.
Please pay net of all bank charges.

Breakdown of Time on a Daily Basis

HFW Bill No S08039

<u>Club Ref</u>	<u>NA</u>		
<u>Our File No</u>	00010656 / 00000022		
<u>Client</u>	Sea Consortium Pte Ltd		
<u>Matter</u>	SX Jami / X-Press Resolve / X-Press		
<u>Transaction</u>			
<u>Date</u>	<u>FE Name</u>		<u>Hours</u>
27/04/2007	D M Janssen	Email from Orr Dignam and response; researching enforcement of foreign arbitration award during transition period under new Malaysian legislation, briefing Simon Davidson, briefing note to Lee Ong & Kandiah with enquiry re statutory demand, email response from Jainil Bhandari with draft statutory demand; briefing by Simon Davidson and research on time limit and procedure for witness statement in reply to appeal, email enquiry to counsel David Lewis and considering response; email from SeaCon on vessel positions; email from arbitrator on time limit for HRC to respond on interest and costs, fax from arbitrator on appeal;	2.5
28/04/2007	D M Janssen	Emails from A Hossain & Associates and Mark Hamsher, email reply, email from Simon Davidson;	0.2
30/04/2007	S S Davidson	Considering Hossain submissions on costs and interest. Drafting reply submissions and report to clients. Email from counsel.	0.6
03/05/2007	D M Janssen	Briefing by Simon Davidson, reviewing email correspondence, email reminder to Orr Dignam, email advice on Taiwanese law and procedure to Jeffrey Lim;	1.4
04/05/2007	D M Janssen	Email from Dr Zahir, report and recommendations to SeaCon and RaetsAsia, response to Dr Zahir and reply; email from SeaCon on HRC vessel movements; telcon with Tim Hartnoll as to timing for enforcement in Singapore; reviewing appeal claim form and reconciling sums put forward by Watson Farley & Williams;	1.8
05/05/2007	D M Janssen	Email advice from Freehills, email report to SeaCon;	0.2
07/05/2007	S S Davidson	Reviewing counsel's draft appeal documents and discussion with DMJ.	0.6
07/05/2007	D M Janssen	Email advice and drafts from counsel, reviewing and amending witness statement on appeal, email revised drafts with recommendations to SeaCon and RaetsAsia, email instructions from Jeffrey Lim and Yong Lim Kong, discussing matter with Simon Davidson, email response to counsel with instructions to HFW London for filing re-amended witness statements and claim form; email reminder to Orr Dignam re outstanding advice on address for service of HRC; email from SeaCon on vessel positions;	3.0
08/05/2007	S S Davidson	Email from Freehills and Dr Zahir. Email to Orr, Dignam. Discussion with DMJ. Call to HFW London.	0.5
08/05/2007	S S Davidson	Email from Freehills and reply.	0.2

08/05/2007	D M Janssen	Briefing Simon Davidson, reviewing and amending urgent reminder to Mr Hafizullah of Orr Dignam; discussing and considering email from Freehills to Watson Farley & Williams with Simon Davidson; arranging and supervising notarisation and legalisation of award for enforcement proceedings in the US, email to Freehills; emails from Dr Zahir reporting on proceedings in Bangladesh, report to SeaCon and RaetsAsia and email instructions to Dr Zahir; telcon with Yong Lim Kong explaining position on enforcement steps; email to SeaCon and RaetsAsia on position in US and France;	2.5
09/05/2007	S S Davidson	Emails to Freehills and report to clients.	0.3
09/05/2007	D M Janssen	Email from Freehills re attachment of funds on transfer to WFW, discussing and considering issue with Simon Davidson and reviewing instructions to Freehills and report to SeaCon, email confirmation of instructions from SeaCon; email from HFW London re witness statement in response to appeal, scanning and forwarding documents to be exhibited with email response to HFW London; arranging and supervising legalisation of notarised award at US embassy, courier letter and email instructions to Freehills; further discussing and considering matter with Simon Davidson; email reminder to Mark Hamsher re award on costs of award and interest; telcon with and email instructions to Kendall Tan of Rajah & Tann re garnishing of HRC bank accounts and seizing HRC ships at Singapore; telcon with Sarah Taylor of HFW London to finalise witness statement; email correspondence with counsel and Sarah Taylor over final version of witness statement; telcon with Orr Dignam re affidavit of service	5.6
10/05/2007	S S Davidson	Reviewing position on enforcement and discussion with DMJ.	1.0
10/05/2007	D M Janssen	Perusing emails from counsel and HFW London confirming the filing of the witness statement and claim form in response to the appeal against the award in London, email report to SeaCon and RaetsAsia; considering email from Freehills and discussing matter with Simon Davidson, email report to SeaCon and RaetsAsia; email reports from Orr Dignam on proceedings in Bangladesh and service of Singapore court order, telcons with Nasreen Hafiz of Orr Dignam re affidavit of service, reviewing correspondence files re service on HRC, email correspondence and telcons with Kendall Tan and legal research re requirements for effective and valid service out of the jurisdiction, briefing Simon Davidson on service issues; email correspondence with Yong Lim Kong and Jeffrey Lim re documentation required for garnishee and seizure and sale proceedings in Singapore, forwarding information and documentation by email to Kendall Tan of Rajah & Tann; telcon with Toh Kian Sing of Rajah & Tann re application served by Gurbani's challenging enforcement of award in Singapore, briefing Simon Davidson, reporting to SeaCon and RaetsAsia, receiving and forwarding summons and affidavit, email instructions to Orr Dignam to stand down re affidavit of service, email instructions to Freehills to go ahead with enforcement in New York on the strength of the award, further email reports to SeaCon and RaetsAsia;	5.5
11/05/2007	S S Davidson	Emails from Freehills and Rajah & Tann. Email to Rajah & Tann. Meeting with Rajah & Tann.	1.6

11/05/2007	D M Janssen	Perusing emails from Rajah & Tann, HFW London, Freehills, SeaCon and Dr Zahir, considering reports and advices, discussing matters with Simon Davidson; research on HRC Shipping Singapore and Bangladesh addresses, bank accounts and shareholders/directors; meeting with Rajah & Tann, email reports to SeaCon and RaetsAsia on proceedings in Singapore, US and Bangladesh; email responses and instructions to HFW London, Freehills and Dr Zahir; reviewing and collating documents, liaising with Kendall Tan of Rajah & Tann, email instructions and courier letter with documents for service to Orr Dignam;	6.0
14/05/2007	S S Davidson	Report from Orr, Dignam. Emails from and call to HFW regarding the appeals.	0.4
14/05/2007	D M Janssen	Perusing emails from HFW London re appeal proceedings, liaising with Simon Davidson; email from Freehills re source of attached funds; telcon with Mr Hafizullah of Orr Dignam, email report of rejection of HRC's plaint to SeaCon and RaetsAsia, email enquiry to SeaCon seeking information as requested by Freehills to support attachment of transfers; fax from Rajah & Tann in response to Gurbani & Co; considering fax from Watson Farley & Williams re appeal proceedings;	2.5
15/05/2007	D M Janssen	Email correspondence and fax from HFW London re Watson Farley & Williams assertions on appeal procedure; emails from Dr Zahir and Orr Dignam on rejection of HRC's plain in Bangladesh action; email from Orr Dignam on service of Singapore proceedings; email from Freehills on US attachments; discussing and considering matters with Simon Davidson; email from Yong Lim Kong on HRC operations in Malaysia; email reports and recommendations to SeaCon and RaetsAsia in respect of Bangladesh proceedings and US Rule B attachments; email response to Freehills on HRC Shipping Singapore transfers; email from SeaCon and confirming instructions to Dr Zahir; email correspondence and telcon with Yong Lim Kong re investigation of HRC Shipping of Singapore; late night long telcon with Mike Unger of Freehills re extending attachments to include HRC Shipping of Singapore as paying agent for HRC Shipping of Bangladesh;	4.4
15/05/2007	S S Davidson	Emails from Orr, Dignam, Dr Zahir and Freehills. Discussions with DMJ.	0.4
16/05/2007	D M Janssen	Emails from Mark Hamsher, Freehills and Dr Zahir; email instructions to Orr Dignam, Rajah & Tann and Dr Zahir; email reports and recommendations to SeaCon and RaetsClub; emails from and telcons with Yong Lim Kong re information on HRC Shipping of Singapore; briefing Simon Davidson; telcon with HFW London re appeal proceedings; email advice from Rajah & Tann;	4.6
16/05/2007	S S Davidson	Emails from Freehills and client. Discussion with DMJ.	0.3
17/05/2007	D M Janssen	Fax from Watson Farley & Williams with further statement; email from HFW London on appeal hearing in London; email from Orr Dignam on Service of Singapore court documents in Bangladesh, email queries to Rajah & Tann, discussing and considering matter in telcon with Toh Klan Sing, further email correspondence with Rajah & Tann, perusing fax exchange with Gurbani & Co; emails from Dr Zahir and SeaCon on appeal in Bangladesh; email from Hossain on second award and report to SeaCon and RaetsAsia; email correspondence and telcon with Yong Lim Kong re HRC's Singapore agent;	4.7

18/05/2007	D M Janssen	Emails from Michael Unger of Freehills, emails from Sarah Taylor of HFW London and counsel David Lewis, briefing Simon Davidson; email correspondence with Yong Lim Kong re HRC operations in Singapore; email instructions to Mike Unger of Freehills with information and documents gathered by SeaCon, telcons and email from Toh Kian Sing of Rajah & Tann, reviewing draft summons and affidavit for Singapore proceedings, email to Orr Dignam seeking further advices, email response with initial comments to Rajah & Tann; preparing schedule of attachments in US and France, email schedule to Freehills, email report to SeaCon and Raetsasia;	5.7
18/05/2007	S S Davidson	Reviewing witness statements from Watson Farley and other correspondence.	0.4
19/05/2007	D M Janssen	Email advices from Michael Unger of Freehills and Toh Kian Sing of Rajah & Tann;	0.2
21/05/2007	D M Janssen	Briefing Simon Davidson, discussing and considering advices from Rajah & Tann and Orr Dignam, teleconference with Rajah & Tann, telcons with Orr Dignam, instructing Orr Dignam to reserve Singapore court documents, reviewing and amending draft summons and affidavit for Singapore proceedings, telcons and email exchanges with Rajah & Tann, finalising affidavit and exhibits, attending at Rajah & Tann's offices to review and execute affidavit, briefing Simon Davidson, receiving scanned copies of summons and affidavit as filed; perusing emails from Yong Lim Kong and discussing them with Simon Davidson;	5.5
21/05/2007	S S Davidson	Reviewing advice from Rajah & Tann. Discussion with DMJ. Call to Rajah & Tann.	0.5
21/05/2007	S S Davidson	Reviewing draft summons and affidavit in Singapore enforcement proceedings.	0.5
22/05/2007	D M Janssen	Briefing Simon Davidson, considering fax and email messages from Rajah & Tann on court proceedings and time table, telcons with Kendall Tan, email instructions to Freehills and reply, status report to SeaCon and RaetsAsia, email from Orr Dignam and response;	3.5
22/05/2007	S S Davidson	Fax from Rajah & Tann.	0.1
23/05/2007	D M Janssen	Perusing email report from Dr Zahir, considering forwarded orders of the Appellate Division, discussing matter with Simon Davidson, email report and summary to SeaCon and RaetsAsia; email from Kendall Tan on fixing of hearing, email response forwarding Orr Dignam's advices on attempts to reserve HRC Shipping in Bangladesh; further email report to SeaCon and RaetsAsia; email correspondence with HFW London re timetable and counsel; reviewing pleadings to confirm there is reliance in the alternative on assignment of claims for vessel the arbitrator held to be on hire;	2.0
23/05/2007	S S Davidson	Email from Dr Zahir.	0.1

24/05/2007	D M Janssen	Perusing email from Mark Hamsher re publication of award and email report to SeaCon and RaetsAsia; perusing email and faxes from HFW London and Watson Farley & Williams re timetable for court proceedings; long telcon with Kendall Tan and briefing Simon Davidson, email instructions re further service attempt to Orr Dignam; email from Jeffrey Lim with applications to set aside French arrests, discussing issue with Simon Davidson, email response to SeaCon and email request for advice to HFW Paris, email reply from HFW Paris; receiving notice of publication of second award, liaising with Jeffrey Lim to arrange payment of costs of award, liaising with Mark Hamsher to obtain immediate release of award against undertaking in respect of costs, receiving and reviewing award, liaising with HFW London to arrange collection of original award, preparing interest calculation and drafting letter of demand; perusing email from HFW London re timetable and costs;	5.2
25/05/2007	D M Janssen	Liaising with HFW London re collection of second award, fax from Mark Hamsher re mailing of award, discussing second award with Simon Davidson, email to SeaCon and RaetsAsia with draft demand and interest calculation, email correspondence with Jeffrey Lim re recovery of legal costs; email correspondence with HFW London re costs estimate for London proceedings and informing SeaCon and RaetsAsia by email; email to Jainil Bhandari with information for enforcement steps in Malaysia; email instructions from Yong Ling Kong and serving demand for payment of second award on HRC with copies to Hossain and WFW; email from Kendall Tan of Rajah & Tann with draft affidavit and further queries for Orr Dignam, reviewing affidavit and forwarding it to Orr Dignam with instructions for affidavit of service and requests for advices and corporate information;	3.9
25/05/2007	S S Davidson	Reviewing second arbitration award. Reviewing correspondence.	0.6
28/05/2007	D M Janssen	Perusing email from HFW London, considering costs estimates, discussing London proceedings with Simon Davidson; receiving original of arbitrator's second award; email from Orr Dignam and courier letter with requested hardcopy attachments for affidavit of service to Orr Dignam.	0.5

Total: 79.5

SUMMARY			
	Hours Charged	Hourly Rate	Total
Partner Simon Davidson	8.1	S\$775	S\$ 6,277.50
Assistant Solicitor Dirk Janssen	71.4	S\$600	S\$42,840.00
Total :			<u>S\$49,117.50</u>

Case 1:07-cv-09443-PAC
Sea Consortium Pte Ltd
11 Duxton Hill
Singapore 089595

Document 9-5

Filed 04/04/2008 Page 19 of 25

Singapore 049483

Tel +65 6534 0195
Fax +65 6534 5864

Attention: Messrs Tim Hartnoll/Tristan Howitt

holmans@hfw.com.sg
www.hfw.com

TAX INVOICE
GST REG NO: M9-0005261-C

Date: 29 June 2007

Our Ref: SSD/10656/22/iy

Bill No.: S08067

JAAMI

Period Covered : 29 May to 27 June 2007

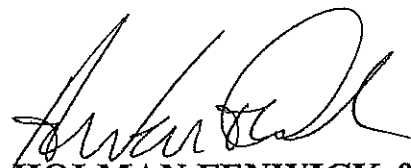
To our professional charges for all advice and assistance given in this matter as set out in the attached breakdown of time spent.

Our fees:	S\$ 44,922.50
+5% GST	S\$ 2,246.13

Disbursements:

Freehill Hogan & Mahar bill 116842, attached	S\$ 17,406.14
Professional fees of Mr David Lewis as per bill attached	S\$ 12,116.00
Rajah & Tann's bill 738057 (less discount of S\$5,000)	S\$ 49,632.91
Courier, telephone, fax and photocopying charges, and other incidentals	S\$ 397.55
+5% GST	<u>S\$ 3,977.63</u>

Total	<u>S\$130,698.86</u>
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HOLMAN FENWICK & WILLAN
HFWSP\88925-1

Direct remittance may be made to The Hong Kong and Shanghai Banking Co. Ltd.
Collyer Quay Branch, 21 Collyer Quay, Singapore 049320, quoting our bill no.
GB Pounds A/C 260-258843-181 Swift Code: HSBCSGSG
Singapore Dollars A/C 141-364083-002 Swift Code: HSBCSGSG
US Dollars A/C 260-258843-180 Swift Code: HSBCSGSG
If paying by cheque, please return the attached copy with your payment.
Please pay net of all bank charges.

Breakdown of Time on a Daily Basis

HFW Bill No S08067

Club Ref: NA
 Our File No: 00010656 / 00000022
 Client: Sea Consortium Pte Ltd
 Matter: SX Jaam / X-Press Resolve / X-Press

Transaction Date	FE Name	Hours
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30/05/2007	D Janssen	Email from Rajah & Tann, reviewing and amending further draft affidavit in reply to challenge to enforcement, discussing and considering draft with Simon Davidson and in telcon with Kendall Tan; email to and telcon with Orr Dignam re affidavit of service and outstanding advice; perusing fax from Rajah & Tann re scheduling of Singapore hearing, discussing issue with Simon Davidson, telcon with Kendall Tan and email to Sarah Taylor of HFW London re London hearing; liaising with Rajah & Tann re amendments to and execution of affidavit and preparation of papers for enforcement of second award;	4.3
30/05/2007	D Janssen	Several long telcons with Toh Kian Sing of Rajah & Tann discussing timing of application for leave to enforce second award in the context of substantial hearing of the challenge to enforcement of first award, tactical and strategic considerations; email correspondence with Sarah Taylor of HFW London re hearing on the 14th of June;	0.5
30/05/2007	S S Davidson	Reviewing Singapore enforcement affidavit.	0.5
01/06/2007	D Janssen	Fax and courier letter from Orr Dignam with affidavit of service, telcon Orr Dignam re outstanding advice, email from Orr Dignam re service through government, scanning and forwarding advice and affidavit to Rajah & Tann for reply affidavit; briefing Simon Davidson, teleconference with Toh Kian Sing, discussing and considering strategy and tactics of seeking enforcement of second award, email report to SeaCon and RaetsAsia, receiving email confirmation of instructions to Rajah & Tann to proceed; emails from and telcons with Rajah & Tann re reply affidavit, reviewing and amending revised draft, email response with scanned documents and re-amended affidavit to Rajah & Tann, attending at Rajah & Tann's offices for swearing of affidavit, email report to SeaCon and RaetsAsia; email from Yong Lim Kong on exposure to counter-claim in France, email response to Yong Lim Kong and email reminder seeking advice from HFW Paris; liaising with notary over certification of second award; email report and advice from Mike Unger of Freehills re attachments in New York, email report and recommendations to SeaCon and RaetsAsia, email response to Mike Unger; liaising with HFW London re instructions to counsel David Lewis;	4.5
01/06/2007	S S Davidson	Emails from New York lawyers. Discuss tactics with DMJ. Conference call to Rajah & Tann.	0.5

04/06/2007	D Janssen	Liaising with DHL over return of court documents delivered to HRC Shipping in Dhaka; Telcons and email exchanges with Rajah & Tann over certification and affidavit in support of enforcement of second award as well as filing of court documents in reply to challenge against enforcement of first award, briefing Simon Davidson, reviewing draft summons and affidavit;	3.5
04/06/2007	S S Davidson	Reviewing emails and discussion with DMJ.	0.2
05/06/2007	S S Davidson	Emails from Rajah & Tann and reply.	0.2
05/06/2007	D Janssen	C/M Discussing and considering matter with Simon Davidson, reviewing email instructions to Rajah & Tann and Toh Kian Sing's response, perusing fax as sent to Gurbani & Co re Bangladeshi law affidavit, liaising with Tara Davenport of Rajah & Tann by email and telcons over correspondence and affidavits both in respect of challenge to first award and leave to enforce second award, revising draft summons and affidavit, further email exchanges and telcons with Rajah & Tann; email from HFW London liaising with counsel;	3.1
06/06/2007	D Janssen	Email correspondence and telcons with Rajah & Tann to finalise affidavits, attending at Rajah & Tann's office with notary to swear affidavit and certify second award, discussing and considering strategy for application to assistant registrar with Toh Kian Sing; perusing email from counsel re hearing in London; telcon report from Toh Kian Sing on successful application and briefing Simon Davidson by email, email correspondence and telcon with Simon Davidson, further email report from Rajah & Tann and telcons with Toh Kian Sing and Tara Davenport; email instructions from Yong Lim Kong on US attachments, email response and confirming instructions to Mike Unger of Freehills; liaising with Singapore post and DHL to obtain written confirmation of HRC's rejection of delivered letters and give instructions for returned documents; briefing Rajah & Tann and arranging service of order for leave to enforce second award; perusing emails re shipwatch in Colombo; email report to SeaCon and RaetsAsia on hearing in Singapore; fax from Watson Farley & Williams re second award, liaising with HFW London over fax and instructions to counsel;	3.2
07/06/2007	D Janssen	Fax from Watson Farley & Williams re second award, liaising with HFW London and discussing and considering matter with Simon Davidson, email response to WFW; receiving sealed court documents from Rajah & Tann, collating bundles, telcons with Tara Davenport of R&T; receiving notice from Singapore Post re registered mail to Bangladesh, forwarding notice of refusal of acceptance by email to Rajah & Tann; research on tracking HRC's fleet;	2.0
08/06/2007	D Janssen	Emails from Mike Unger of Freehills, considering advice, reviewing and amending draft declarations for SeaCon and HFW, email report and recommendations to SeaCon, liaising with Yong Lim Kong by email and in telcons, further revising HFW declaration to incorporate statements on proceedings in London and Singapore, email responses and instructions to Freehills, discussing and considering matter with Simon Davidson; email reminders to HFW France and Orr Dignam re outstanding advices and information; fax from Watson Farley & Williams and liaising with HFW London to brief counsel re solicitor's correspondence;	5.5

08/06/2007	S S Davidson	Email from Freehills. Discussion with DMJ and email to HFW Paris.	0.3
09/06/2007	D Janssen	Perusing emails from Freehills, considering submissions, reviewing revised draft declarations for SeaCon and HFW;	1.0
11/06/2007	S S Davidson	Reviewing correspondences and discussion with DMJ.	0.2
11/06/2007	D Janssen	Reviewing and amending draft declarations of Yong Lim Kong for SeaCon and Dirk Janssen for HFW to be filed in New York, liaising with Yong Lim Kong and Jeffrey Lim to finalise SeaCon's declaration and exhibits, signing, scanning and forwarding finalised declarations to Freehills for filing; email from Rajah & Tann re HRC's refusal to take delivery of court order for second award, email response and incorporating information into US declaration; Liaising with Sarah Taylor of HFW London over instructions to counsel for hearing on 14 June.	3.4
12/06/2007	D Janssen	Email from counsel's clerk, discussing fee estimate with Simon Davidson, email response to chambers and instructions to HFW London; emails from Mike Unger of Freehills advising on adjournment of hearing and charges incurred, email report to SeaCon and RaetsAsia and response to Mike Unger; telcon with and email confirmation from DHL of further refusal by HRC to accept delivery of courier letter with demand for payment of second award, email instructions to DHL in response; emails from HFW Paris, considering advice on challenge to conservatory attachments, reviewing submissions and documentation, collating and scanning relevant documentation to support defence of attachments in France, detailed email response and instructions to HFW Paris with scanned documents and statements, liaising with Stephanie Schweitzer of HFW Paris; email instructions to counsel David Lewis for London hearing.	5.4
13/06/2007	D Janssen	Emails from HFW London and Counsel, fax from WFW, discussing and considering WFW's submissions in London and Paris with Simon Davidson and reviewing instructions to counsel; email from Freehills, reviewing and considering submissions in US proceedings; researching Dhaka Bank in view of good standing confirmation issued for HRC Shipping for French proceedings; telcon with Sarah Taylor of HFW London re fax costs schedule received from WFW and HFW cost schedule to be submitted by HFW London, providing Sarah Taylor with rates and billing breakdown for schedule; email instructions and further evidence to HFW Paris to assist in defeating the challenge to the conservatory attachments; email confirmation of further refusal by HRC to take delivery of DHL documents to Rajah & Tann as prejudicial evidence of HRC continuing to be obstructive; email report to SeaCon and RaetsAsia on US proceedings and response to Freehills.	4.0
13/06/2007	S S Davidson	Considering HRC skeleton argument in London appeals and preparing note to counsel. Report to clients. Emails from HFW Paris and Freehills in New York. Discussion with DMJ. Reviewing costs schedules with DMJ.	1.6
14/06/2007	S S Davidson	Considering counsel's skeleton argument. Preparing note to counsel on exclusion of appeals. Report to clients on the skeleton and upon Watson, Farley's costs schedule. Receiving notice of decision in London. Calls to SeaCon.	1.6

14/06/2007	D Janssen	Perusing email from Rajah & Tann re service of court documents for second award; perusing email correspondence with counsel David Lewis and reviewing submissions; liaising with Simon Davidson re schedules of costs for hearing, briefing by Simon Davidson on decision at hearing, perusing reports.	0.7
15/06/2007	S S Davidson	Reporting on hearing in London. Email to Rajah & Tann. Email from SeaCon.	0.6
15/06/2007	D Janssen	Perusing emails from counsel, HFW London and HFW Singapore on draft order dismissing HRC's challenge and refusing leave to appeal; Perusing emails from SeaCon and Rajah & Tann on outcome of hearing; Reviewing email from SeaCon on company structure and evidence of relation with SeaCon Bangladesh, liaising with Simon Davidson.	0.7
18/06/2007	S S Davidson	Note from HFW London. Emails to clients, HFW London and Rajah & Tann. Discussion with DMJ.	0.5
18/06/2007	D Janssen	Email from HFW London with draft note on the judge's reasoning at the hearing, considering email reports and recommendations and briefing by Simon Davidson, reviewing and amending note of order and reasons given, circulating note for comments and approval; Email from Singapore Post re refusal of registered mail service by HRC in Bangladesh; Email advice and recommendations in response to SeaCon on relationship SeaCon Singapore and Bangladesh, email information and instructions to Freehills in this respect to support opposition to HRC's motion to vacate US attachments; Perusing email from Rajah & Tann re deadlines for Singapore proceedings and their fax to Gurbani's.	2.5
19/06/2007	S S Davidson	Email from counsel and reply. Discussion with DMJ.	0.4
19/06/2007	D Janssen	Email from counsel David Lewis on exchanges with Hossain QC regarding judge's order, reviewing email correspondence and instructions thereon; Letter from Rajah & Tann and email enquiry in response after discussing matter with Simon Davidson; Further review of WFW's motion for HRC's challenge of US attachments, email comments and instructions to Freehills, email correspondence with Mike Unger of Freehills; Email enquiry to HFW Paris re total amount funds attached in France at CMA-CGM and considering response, email correspondence with Stephanie Schweitzer of HFW Paris.	2.3
22/06/2007	D Janssen	Discussing and considering matter with Simon Davidson, telcons with Kendall Tan of Rajah & Tann re service of court documents in Bangladesh.	0.3
23/06/2007	D Janssen	Email from Mike Unger of Freehills with draft declarations.	0.2
25/06/2007	S S Davidson	Email from Freehills. Discussion with DMJ. Reviewing declarations for US proceedings.	0.5

25/06/2007	D Janssen	Discussing and considering matter with Simon Davidson; Reviewing and amending draft declarations prepared by Mike Unger of Freehills; Liaising with HFW London and counsel re progress with obtaining transcript of hearing and sealed order; Email from HFW Paris with confirmation from CMA-CGM of funds attached and translation, email response and incorporating confirmation into revised declaration; Liaising with Yong Lim Kong by email and in telcons to review and finalise declarations, obtaining and scanning further exhibits, email response and instructions with signed declarations to Mike Unger of Freehills after final amendments with Simon Davidson, Email from Kendall Tan of Rajah & Tann; Courier letter from Orr Dignam with company register information on HRC, forwarding registered office advice to Rajah & Tann with instructions for service of court order and statutory demand.	5.0
26/06/2007	S S Davidson	Reviewing filed papers in the US proceedings. Email from HFW Paris. Discussion with Dirk Janssen.	0.4
26/06/2007	D Janssen	Perusing email from HFW Paris and discussing suggestion to reserve French attachment order with Simon Davidson; Perusing email from Freehills and considering submissions filed with declarations in reply to motion to vacate US attachments, reviewing and amending draft declaration in support of motion to convert awards into US judgments for enforcement against attached funds; Email from and liaising with Rajah & Tann over costs; Receiving original declaration of Yong Lim Kong and courier letter to Freehills with original signed declarations; Perusing email from counsel to court seeking judge's approval of draft order; Email report to SeaCon and RaetsAsia; Email correspondence with Jainil Bhandari re statutory demand for Malaysia; Liaising with Kendall Tan of Rajah & Tann by email and in telcons over service of documents in Bangladesh and calculation of awarded costs and interests for statutory demand, revising and updating costs and interest spreadsheet; Email to Freehills with revised declaration and seeking clarification of procedure and time-table.	4.0
27/06/2007	S S Davidson	Various emails from counsel's clerk, HFW London and Freehills. Call to and email to clients to report. Discussing quantum with DMJ. Call to Rajah & Tann. Two emails to Watson, Farley & Williams.	2.0
27/06/2007	D Janssen	Emails from Counsel David Lewis re sealed order, emails from Freehills re US attachment and enforcement proceedings, emails from HFW London re possible settlement approach from Watson Farley & Williams; discussing and considering matter with Simon Davidson, email instructions to Kendall Tan of Rajah & Tann, email instructions and enquiries to Freehills on procedure following withdrawal of challenges and any recoverable costs, email to HFW Paris re developments with instructions to proceed with re-service of attachment order, liaising with Rajah & Tann over affidavit for Singapore enforcement proceedings; drafting schedule of claims, interest and costs due from HRC to date, obtaining and considering estimates and advices on incurred and recoverable fees for schedule, reviewing draft schedule with Simon Davidson, drafting open message to WFW enclosing schedule; liaising with Jainil Bhandari over service of Malaysian statutory demand; receiving bundle of documents to be "re-served" by personal service in Bangladesh.	6.5

Total: 72.1

SUMMARY

		Hours Charged	Hourly Rate	Total
Partner	Simon Davidson	9.5	\$775	\$ 7,362.50
Assistant Solicitor	Dirk Janssen	62.6	\$600	\$37,560.00
			Total :	\$44,922.50

HFWSP\89977-1